

30 1989

For Six Month Period Ending

(Insert date)

Name of Registrant DEVELOPMENT COUNSELLORS INTERNATIONAL, LTD.

Registration No. 1421

Business Address of Registrant

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

NOT APPLICABLE

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

NOT APPLICABLE Position

Date Connection Ended

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4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?  
 Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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NOT APPLICABLE

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?  
 Yes ☐ No ☐

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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NOT APPLICABLE

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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NOT APPLICABLE

## II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☒

No ☐

If yes, furnish the following information:

*Name of foreign principal*

*Date of Termination*

EASTERN CARIBBEAN INVESTMENT PROMOTION  
SERVICE

11/30/88

9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period?

Yes ☐

No ☒

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

NOT APPLICABLE

10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

SWEDISH TOURIST BOARD

## III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

SWEDISH TOURIST: Consultations, planning luncheon, arranging dates for media appearances.

ECIPS: Promotion of investment for OECS countries, developing business leads, placing ads, planning promotional event.

<sup>1</sup>The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?  
 Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Activities detailed in response to Question 11 of this report.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

NOT APPLICABLE

<sup>2</sup>The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

## IV—FINANCIAL INFORMATION

## 14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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SEE ATTACHED

Total

## (b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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NOT APPLICABLE

<sup>3</sup>A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

<sup>4</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement?      Yes ☒      No ☐

(2) transmitted monies to any such foreign principal?      Yes ☐      No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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NOT APPLICABLE

## 15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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NOT APPLICABLE

## (c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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NOT APPLICABLE

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### V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

ECIPS

17. Identify each such foreign principal.

<sup>5</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

NOT APPLICABLE

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☒ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams  
☒ Advertising campaigns ☒ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☐ Newspapers ☐ Libraries  
☐ Legislators ☐ Editors ☐ Educational institutions  
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in this political propaganda:

☐ English

☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☒ No ☐

## VI—EXHIBITS AND ATTACHMENTS

### 25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A<sup>6</sup> Yes ☐ No ☐  
 Exhibit B<sup>7</sup> Yes ☐ No ☐

NOT APPLICABLE

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

NOT APPLICABLE

<sup>6</sup>The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup>The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.



## 26. EXHIBIT C

If you have previously filed an Exhibit C<sup>\*</sup>, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

NOT APPLICABLE

## 27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

NOT APPLICABLE

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge. I declare under penalty of perjury that the foregoing is true and correct.

Executed on 3/13/89

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

(Type or print name under each signature)

*Emanuel T. Ellenis*

Emanuel T. Ellenis, Exec. Vice-President

Subscribed and sworn to before me at \_\_\_\_\_

this \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_

(Signature of notary or other officer)

<sup>\*</sup>The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

220 Fifth Avenue  
New York New York 10001  
USA  
212.725.0707

DEVELOPMENT COUNSELLORS INTERNATIONAL, LTD.

FOREIGN CLIENT RECEIPTS & DISBURSEMENTS

7/29/88-1/29/89

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SWEDISH TOURIST COMMISSION

Cash Receipts:	Fee	Expenses	Total
Totals	0.00	0.00	0.00

Cash Disbursements:	Name	STC	Amt.	Type
8/11/88	Amer. Express		327.20	Entertainment
8/15	Choice Communications		63.00	Messenger
	FederalExpress		16.75	Messenger
	NY Filmworks		43.59	Product.
	MCI Telecommunic.		4.93	Telephone
9/8	VideoCentral		1,244.88	Taping
9/14	UPS		120.75	Messenger
9/15	Choice Messsenger		27.00	Messenger
	FederalExpress		59.00	Messenger
	Media Distrib.		411.51	Product.
	MCI Telecommunic.		7.09	Telephone
9/28	Metro Product.		5,412.50	Video
	Peggy Bendel		14.00	Expenses
10/3	Roxann Carbone		63.00	Clerical
10/12	Choice Courier		27.00	Messenger
11/14	P. Bendel		31.00	Expenses
	Choice courier		18.00	Messenger
11/30	News Entertainment		2,000.00	Fee
12/5	Ted M. Levine		11.40	Travel
12/7	Eagle Master		41.45	Product.
12/13	Roxann Carbone		33.00	Clerical
12/14	Choice Courier		107.75	Messenger
	Media Distrib.		243.86	Product.
	Pulsar Photographics		164.75	Product.
	MCI		4.06	Telephone
12/16	P. Bendel		19.00	Travel
12/19	Ted M. Levine		13.00	Travel

Totals-STC 10,528.97

●Development Counsellors International

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New York New York 10001  
USA  
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ECIPS

Cash Receipts:	Fee	Expenses	Total
8/17/88	13,662.00	343.30	14,005.30
9/15	14,022.00	1,855.37	15,877.37
10/26	14,625.00	1049.57	15,674.57
11/9	11,268.00	15471.48	26,739.48
12/13	5,508.00	12423.63	17,931.63
12/19		439.47	439.47
12/27 (Check Returned)		-439.47	-439.47
1/17/89	6,800.00		6,800.00
		439.47	439.47
		10,125.45	10,125.45
		19.50	19.50
		1,728.15	1,728.15
			0.00
Totals	65,885.00	43,455.92	109,340.92

Cash Disbursements:	Name	ECIPS	Amt.
8/3/88	Cecele Fraenkel		69.60 Expenses
8/8	Ted M. Levine		24.20 Expenses
8/11	Amer. Express		85.00 Entertainment
8/15	L. James Eaton		2,500.00 Fee
	MCI Telecommunis.		12.29 Telephone
8/25	Ted M. Levine		39.45 Expenses
9/6	Amer. Express		356.00 Expenses
9/15	Choice Messenger		18.00 Messenger
	FederalExpress		41.75 Messenger
	Jack Dobson		300.00 FEE
	Hopkins Assoc.		22.46 Production
	Line & Tone Typo		75.00 Production
	Media Distrib.		121.40 Production
	Quad Center		231.64 Production
	Copy Line Corp.		16.24 Production
	MCA Telecommunic.		24.66 Telephone
9/22	L. J. Eaton		2,500.00 Fee
9/27	Ted M. Levine		20.75 Expenses
10/3	NY Chamb. of Comm.		75.00 Book
	F. Knight		3.25 Product.
	Amer. Express		875.30 Expenses
10/11	T. M. Levine		44.65 Expenses
10/12	A Square Photo		4.25 Product.
	MCI Telecomm.		57.98 Telephone
	FederalExpress		29.25 Messenger
	Choice Courier		9.00 Messenger
	EXEC. CHARGE		87.50 Travel

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10/17	Ted M. Levine	26.40 Expenses
10/20	L. JAMES EATON	596.72 Expenses
	L. JAMES EATON	2,500.00 Fee
10/25	Copyline Corp.	94.72 Production
	Quad Center	147.60 Production
10/26	Ted M. Levine	46.00 Expenses
	Amer. Expres	32.31 Expenses
11/1	Ted M. Levine	42.45 Expenses
	Amer. Express	100.42 Expenses
11/7	Ted M. Levine	101.30 Travel
11/9	Bobbin Media	2,248.25 Space
	Computerworld	3,355.80 Space
	Jnl. of Commerce	1,881.38 Space
	Knight Assoc.	220.00 Product.
	Pro Typographers	380.00 Product.
	Graphic Image	190.79 Product.
	Quality Letter Serv.	4,968.44 Product.
11/14	Apollo Stationery	25.33 Supplies
11/14	Choice Courier	9.00 Messsenger
	MCI	83.49 Telephone
	Fed. Express	104.80 Messenger
11/17	Roxann Carbone	84.00 Clerical
11/28	M. Brown	16.00 Entertain.
	L. J. Eaton	2,500.00 Fee
	M. Brown	9.00 Entertain.
12/5	Amer. Express	158.83 Entertain.
12/6	Amer. Express	19.11 Travel
	A Square Photo	5.25 Product.
	Sheraton Centre	427.85 Recept.
12/8	Bobbin Media	64.30 Product.
12/14	Dependable Printing	15.00 Product.
	Choice Courier	9.00 Messenger
	Executive Charge	1,795.80 Travel
	Jembro Press	105.00 Product.
	McGraw Hill	5,538.52 Luncheon
	Plant Sites & Parks	1,793.50 Space
	Putnam Publishing	1,925.25 Space
	Pulsar Photographics	407.25 Product.
	MCI	32.22 Telephone

=====  
Total

=====  
39,705.70  
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DEPT. OF JUSTICE  
CRIMINAL DIVISION